

Name and address:

Esteban Morales (SBN 273948)

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MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.

2049 Century Park East, Suite 300

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

K.A.,

Plaintiff(s),

v.

MINDGEEK S.A.R.L, et al.

Defendant(s),

CASE NUMBER

2:24-cv-04786-WLH-ADS

**APPLICATION OF NON-RESIDENT ATTORNEY
TO APPEAR IN A SPECIFIC CASE
PRO HAC VICE**

INSTRUCTIONS FOR APPLICANTS

- (1) *The attorney seeking to appear pro hac vice must complete Section I of this Application, the certification in Section II, and have the designated Local Counsel sign in Section III. Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application, together with any attachment(s), to a single Portable Document Format (PDF) file.*
- (2) *Have the designated Local Counsel file the Application electronically using the Court's electronic filing system ("Motions and Related Filings => Applications/Ex Parte Applications/Motions/Petitions/Requests => Appear Pro Hac Vice (G-64)", attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required \$500 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application. **Out-of-state federal government attorneys are not required to pay the \$500 fee.** (Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.*

SECTION I - INFORMATION

Biagetti, Peter A.

Applicant's Name (Last Name, First Name & Middle Initial)

check here if federal government attorney ☐

Mintz Levin Cohn Ferris Glovsky and Popeo, P.C.

Firm/Agency Name

One Financial Center

617-542-6000

617-542-2241

Telephone Number

Fax Number

Street Address

Boston, MA 02111

pabiagetti@mintz.com

City, State, Zip Code

E-mail Address

I have been retained to represent the following parties:

Defendants MindGeek S.à r.l., MG Freesites Ltd, MindGeek

USA Incorporated, MG Premium Ltd, MG Global Entertainment

Inc., and 9219-1568 Quebec, Inc.

☐ Plaintiff(s) ☒ Defendant(s) ☐ Other: _____☐ Plaintiff(s) ☐ Defendant(s) ☐ Other: _____

Name(s) of Party(ies) Represented

List all state and federal courts (including appellate courts) to which the applicant has been admitted, and provide the current status of his or her membership. Use Section IV if more room is needed, or to provide additional information.

<u>Name of Court</u>	<u>Date of Admission</u>	<u>Active Member in Good Standing? (if not, please explain)</u>
Massachusetts	12/16/1981	Yes
United States Supreme Court	8/27/1986	Yes
U.S. Court of Appeals-Ninth Circuit	11/30/2021	Yes

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
2:21-cv-4920	Fleites v. MindGeek S.A.R.L., et al.	10/13/22 & 8/6/24	Granted
	[continued in Section IV]		

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

Attorneys must be registered for the Court's electronic filing system to practice pro hac vice in this Court. Submission of this Application will constitute your registration (or re-registration) to use that system. If the Court signs an Order granting your Application, visit www.pacer.gov to complete the registration process and activate your e-filing privileges in the Central District of California.

SECTION II - CERTIFICATION

I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, in which the attorney is physically present on a regular basis to conduct business, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated 9/12/2024

Peter A. Biagetti

Applicant's Name (please type or print)

P. A. Biagetti

Applicant's Signature

Designee's Name (Last Name, First Name & Middle Initial)

Mintz Levin Cohn Ferris Glovsky and Popeo, P.C.

Firm/Agency Name

2049 Century Park East, Suite 300

Street Address

Los Angeles, CA 90067

City, State, Zip Code

310-586-3200

Telephone Number

310-586-3202

Fax Number

emorales@mintz.com

Email Address

273948

Designee's California State Bar Number

I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law, in which I am physically present on a regular basis to conduct business.

Dated 9-12-24

Esteban Morales

Designee's Name (please type or print)



Designee's Signature

SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)

Additional courts to which the applicant has been admitted:

Name of Court	Date of Admission	Active Member in Good Standing?
United States Court of Appeals-First Circuit	02/08/1984	Yes
United States District Court-Northern District of Illinois	07/12/2010	Yes
United States District Court-Massachusetts	02/09/1982	Yes

Additional cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years:

Case Number	Title of Action	Date of Application	Granted/Denied?
24-cv-04788	<i>N.L. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04795	<i>T.C. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04800	<i>X.N. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04801	<i>N.Y. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04791	<i>L.T. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04971	<i>J.C. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04977	<i>W.L. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04992	<i>C.S. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-04998	<i>S.O. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-05026	<i>L.S. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-05185	<i>W.P. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending
24-cv-05190	<i>A.K. v. MindGeek S.A.R.L. et al.</i>	9/12/24	Pending

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on **December 16, 1981**, said Court being the highest Court of Record in said Commonwealth:

Peter A. Biagetti

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **twelfth** day of **September**

in the year of our Lord **two thousand and twenty-four**.



MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification. X3116.